

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	11 Civ. 0691 (LAK)
	:	
STEVEN DONZIGER, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	X	

**NOTICE OF CHEVRON CORPORATION'S
MOTION TO HOLD STEVEN DONZIGER IN CONTEMPT OF COURT FOR HIS
FAILURE TO COMPLY WITH THE COURT'S AUGUST 15 AND 21, 2018 ORDERS**

GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

STERN, KILCULLEN & RUFOLO LLC
325 Columbia Tpke, Ste 110
P.O. Box 992
Florham Park, New Jersey 07932-0992
Telephone: 973.535.1900
Facsimile: 973.535.9664

Attorneys for Plaintiff Chevron Corporation

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Chevron Corporation's ("Chevron") Motion to Hold Steven Donziger in Contempt of Court for His Failure to Comply with this Court's August 15 and 21, 2018 Orders; the Declaration of Anne Champion, dated September 13, 2018; and all prior pleadings and proceedings in this matter, Chevron respectfully moves this Court for entry of an order holding Steven Donziger in civil contempt pursuant to Federal Rule of Civil Procedure 70(e) and Local Civil Rule 83.6 of the Local Rules of the United States District Court for the Southern District of New York, and imposing monetary sanctions, and if noncompliance continues, ordering Donziger arrested and imprisoned until such time as he fully complies with the August 14 and 21, 2018 orders. Chevron further requests such other relief as the Court deems just and proper.

Dated: September 17, 2018

New York, New York

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

/s/ Randy M. Mastro

Randy M. Mastro
Andrea E. Neuman
200 Park Avenue
New York, New York 10166
Telephone: 212.351.4000
Facsimile: 212.351.4035

William E. Thomson
333 South Grand Avenue
Los Angeles, California 90071
Telephone: 213.229.7000
Facsimile: 213.229.7520

STERN, KILCULLEN & RUFOLO LLC
Herbert J. Stern
Joel M. Silverstein
325 Columbia Tpke, Ste 110
P.O. Box 992
Florham Park, New Jersey 07932-0992
Telephone: 973.535.1900
Facsimile: 973.535.9664

Attorneys for Chevron Corporation